

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL RESPONSES TO
INTERROGATORIES**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
7 Ottomotto, LLC’s Administrative Motion to File Under Seal Exhibits to Their Motion to Compel
8 Responses to Interrogatories (the “Administrative Motion”). The Administrative Motion seeks an
9 order sealing the entirety of Exhibit 1 to the Pritt Declaration (“Exhibit 1”).

10 3. The green highlighted portions of Exhibit 1 contain or refer to trade secret information,
11 which Waymo seeks to seal.

12 4. Exhibit 1 (green highlighted portions in version filed herewith) contain, reference,
13 and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the
14 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, including
15 its LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are
16 maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s
17 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors
18 access to descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
19 information were made public, I understand that Waymo’s competitive standing would be
20 significantly harmed.

21 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibit 1 that merit
22 sealing.

23
24
25
26
27
28

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on August 14, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

11
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven